

The Honorable Richard A. Jones

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of
himself and other similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the United
States, *et al.*,

Defendants.

CASE NO. C17-00094-RAJ

**STIPULATION FOR ORDER
PROVISIONALLY EXTENDING
DEADLINES; ORDER THEREON**

WHEREAS on July 9, 2019, the Court entered an order requiring, among other things, that (1) defendants re-redact and produce named plaintiff A-files so as to disclose “why information” originating solely from within U.S. Citizenship and Immigration Services (USCIS); and (2) the parties meet and confer in an effort to reach agreement on the production of a set of unnamed plaintiff A-files smaller in number than the number originally requested by plaintiffs; and

WHEREAS since the July 9, 2019, order, the parties have met and conferred on three occasions to discuss a variety of issues, including defendants’ production of a limited set of A-files of unnamed plaintiffs, logistical problems associated with the production of re-redacted A-files of named plaintiffs, and the impact of those two tasks on the existing case schedule; and

1 WHEREAS the parties are negotiating a proposal to be submitted to the Court for a global
2 extension of the deadlines that will adjust the case schedule to allow defendants to process and
3 plaintiffs to receive the re-redacted named plaintiff A-files that the Court has required defendants to
4 produce and the unnamed plaintiff A-files that defendants have agreed in principle to produce; and

5 WHEREAS the parties anticipate that they will submit a formal proposal for the Court to
6 consider in the next several days, but the formal proposal has not been finalized at the time this
7 stipulation was filed; and

8 WHEREAS, in the meantime, defendants' deadline to produce the A-files of named plaintiffs
9 has expired and the deadline to complete written discovery expires on July 26, 2019 under the
10 existing case schedule; and

11 WHEREAS the parties stipulate and agree, and jointly request that those deadlines be
12 extended until August 2, 2019, so that the parties may submit, and the Court may consider and rule
13 upon, the anticipated stipulated proposal from the parties to globally address issues arising under the
14 existing case schedule in light of the time needed to process the A-files that will be produced by
15 defendants, as well as address other issues necessary to bring discovery to a close.

16 NOW THEREFORE the parties through their respective counsel of record do hereby
17 stipulate and agree that the Court may make and enter the following order:

18 1. The time within which defendants shall be required to produce A-files of named
19 plaintiffs, re-redacted as set forth in the Court's July 9, 2019 order (Dkt. # 274) shall be extended to
20 August 2, 2019; and

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2. The deadline to complete written discovery as set forth in the Court's April 25, 2019 order (Dkt. # 265) is extended from July 26, 2019 to August 2, 2019.

SO STIPULATED.

DATED this 24th day of July, 2019.

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1 **SO STIPULATED.**

2 DATED this 24th day of July, 2019.

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4 s/ Sameer Ahmed

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Counsel for Plaintiffs

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ORDER

IT IS SO ORDERED.

DATED this _____ day of July, 2019.

RICHARD A. JONES
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Crissy Leininger
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